

## **ATTACHMENT 1**

### **International Section 214 Authorization**

#### **OROTEL PTY LIMITED**

##### **Response to Question 9**

Orotel PTY Limited has subsidiaries in Hong Kong SAR (Advantage Telecommunications Limited) and United Kingdom (Advantel Limited) that are foreign carriers in their respective jurisdiction. The foreign affiliates are new market entrants engaged in the provision of wholesale-switched minutes and are not monopoly providers of communication services. Moreover, they are not engaged in the provision of international transport or local access services. As such, the foreign affiliates have no market share in the international transport and the local access markets on the foreign end of the route. As such, Orotel Pty Limited qualifies for streamlined processing and request to be classified as non-dominant carrier.

##### **Response to Question 11**

The applicant is seeking authority to provide services to Hong Kong and the United Kingdom.

##### **Response to Question 15**

Section 63.18 Information:

- d. Orotel PTY Limited has not previously received authority under Section 214 of the Communications Act.
- e. Orotel PTY Limited is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of §63.18 (e)(1), of the Commission's Rules 47 C.F.R. 63.18 (e)(1) and as a resale carrier pursuant to the terms and conditions of §63.18 (e)(2) of the Commission's Rules. 47 C.F.R. 63.18 (e)(2). Orotel Pty Limited requests authority to serve all countries permitted under a grant of global authority. Orotel PTY Limited will comply with the terms and conditions contained in § 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23.
- g. Orotel PTY Limited will use previously authorized facilities to provide the services requested by the Application. Consequently, Orotel PTY Limited is categorically excluded from environmental assessment pursuant to §1.1306 of the Commission's Rules. 47 C.F.R. 1.1306.